1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Rory T. Kay, Esq. (NSBN 12416) Tara U. Teegarden, Esq. (NSBN 15344) McDONALD CARANO LLP 2300 West Sahara Avenue, Suite 1200 Las Vegas, Nevada 89102 Telephone: (702) 873-4100 rkay@mcdonaldcarano.com ttegarden@mcdonaldcarano.com

Attorneys for Defendant Early Warning Services, LLC

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

SAILIJA STARIA, Case No. 2:21-cv-00641-RFB-BNW Plaintiff, STIPULATION AND ORDER TO EXTEND DEADLINE FOR EARLY WARNING SERVICES, LLC TO FILE v. RESPONSIVE PLEADING EARLY WARNING SERVICES, LLC; LEXISNEXIS RISK SOLUTIONS, INC., [First Request] Defendants.

Defendant Early Warning Services, LLC ("EWS") and Plaintiff Sailija Staria ("Plaintiff") (collectively, the "Parties"), by and through their attorneys, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time to File Responsive Pleading up to and including July 9, 2021. In support of the Stipulation, the parties state the following:

- 1. EWS executed a waiver of service and its responsive pleading is currently due June 25, 2021.
- 2. The Parties are engaged in the informal exchange of information regarding the claims against EWS and, therefore, EWS requests a short extension of time to allow the Parties sufficient time to review this information.
- 3. Counsel for Plaintiff has agreed to the requested extension and the requested extension will not impact any other deadlines in this case.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

- 4. This is the first request to extend the deadline for EWS to file its responsive pleading. 5. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.
- 6. Therefore, the Parties hereby stipulate that the deadline for EWS to file its responsive pleading shall be extended through July 9, 2021.

Respectfully submitted this 25th day of June, 2021.

KRIEGER LAW GROUP, LLC

By: <u>/s/ Shawn Miller</u> Shawn Miller, Esq. (NSBN 7825) 2850 W. Horizon Ridge Pkwy., Ste. 200 Henderson, Nevada 89052 smiller@kriegerlawgroup.com

Attorneys for Plaintiff

McDONALD CARANO LLP

By: <u>/s/ Rory T. Kay</u>

Rory T. Kay, Esq. (NSBN 12416) Tara U. Teegarden, Esq. (NSBN 15344) 2300 West Sahara Avenue, Suite 1200 Las Vegas, Nevada 89102 rkay@mcdonaldcarano.com ttegarden@mcdonaldcarano.com

Attorneys for Defendant Early Warning Services, LLC

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: June 28, 2021